Exhibit 223

PLAINTIFFS' OMNIBUS OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT

Case No.: 4:22-md-03047-YGR MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

Reasons for Variability in Feeds



Unavoidable

- 1. Algorithms make imperfect predictions
- 2. Algorithms have computational limits
- 3. Algorithms are subject to the fundamental constraints of information retrieval
- 4. Algorithms can make different assessments than users
 - 5. Algorithm is less accurate for new users

11. Multifeed?

Intentional

- 6. Algorithm diversifies content sources
- 7. Algorithm diversifies content topics
- 8. Algorithm diversifies content
- 9. Algorithm presents content of unknown or lesser known relevance

 - · "Trending" content

 · Smaller creator content
- 10. Algorithm uses "in-feed units" to promote different modalities of content